

1 IN THE UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF MISSOURI
3 REBECCA HUNT and
4 SUSAN A. NURNBERG,
5 Plaintiffs,
6 vs. Case No. 99-4158-CV-C-5
7 STATE OF MISSOURI
8 DEPARTMENT OF CORRECTIONS,
9 and FAVORITE NURSES, INC.,
10 Defendants.
11 VIDEOTAPED DEPOSITION OF DEBRA
12 MACLEOD, a witness, taken on behalf of the
13 Plaintiffs, pursuant to Notice, on the 25th day of
14 February, 2000 at the law offices of Spencer, Fane,
15 Britt & Browne, LLP 9401 Indian Creek Parkway,
16 Overland Park, Kansas before
17 SANDY RIDER, CSR
18 of AAA Reporting Company, a Certified Shorthand
19 Reporter of the State of Kansas.
20 APPEARANCES
21 For the Plaintiffs:
22 Mr. Martin M. Meyers
23 THE MEYERS LAW FIRM
24 1100 Main Street, Suite 2850
25 Kansas City, Missouri 64105
26 For the Defendant Favorite Nurses:
27 Mr. Daniel B. Boatright
28 SPENCER, FANE, BRITT & BROWNE, LLP
29 9401 Indian Creek Parkway, Suite 700
30 Overland Park, Kansas 66210-2005
31 For the Defendant Missouri Department of
32 Corrections:
33 Ms. Sara L. Trower
34 MISSOURI ATTORNEY GENERAL'S OFFICE
35 P.O. Box 899
Jefferson City, Missouri 65102

EXHIBIT J

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1 which we talked about already, with Becky Hunt
2 and Susan Nurnberg, we went through those notes
3 and also the other issues of the sign-in
4 sheets, etc.

5 Q. Does that show something on the 8th, something
6 about calling Alma?

7 A. Yes.

8 Q. What occurred on the 8th?

9 A. It looks like I left a message for her and
10 probably talked to her since I have two check
11 marks there. I don't really recall the
12 conversation, to be honest.

13 Q. And then it looks like something happened on
14 the 11th, but I wasn't clear what it was or at
15 least I marked the 11th for some reason. Maybe
16 it's just that Susan with nothing else by it.

17 A. Oh, these are -- Susan is one of my employees
18 in the Cleveland branch, a coordinator. I have
19 several Susans listed in my book. Should I
20 take that sticky off of there?

21 Q. Yes. If you don't mind.

22 (Discussion held off the record.)

23 Q. (By Mr. Meyers) Ms. MacLeod, I think before we
24 changed the tape you were looking for the next
25 entry in your calendar. Are we up to June 16?

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1 A. We are.

2 Q. Is that the date that Becky gave you her two
3 week notice?

4 A. Yes.

5 Q. Do you remember what she told you?

6 A. It seems to me that she found another job, but
7 I don't recall where.

8 Q. Something outside of Favorite Nurses?

9 A. Yes.

10 Q. Anything else that you discussed with her on
11 June 16 that you can recall?

12 A. Well, I mean, I remember talking to her that I
13 was real sorry it ended up this way and that we
14 couldn't have worked things out. I told her
15 that she needed to return her keys and badge.
16 And I think that was the crux of it. I think
17 she may have said some things that she was very
18 concerned about Susan being there by herself
19 and I told her that we would be looking for a
20 replacement for Becky and hopefully she would
21 have someone soon to help her. She was worried
22 about her working all of the hours by herself.

23 Q. I notice that in the May 20 conversation Becky
24 and Susan told you that the Department of
25 Corrections had tried to change their hours to

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1 she's saying there was a memo on the front door
2 that she's attaching. And then she's saying
3 here's the resignation letter from Susan. And,
4 third, she's telling you that Susan and Becky
5 did not turn in their ID's and needed to do
6 that.

7 A. Uh-huh.

8 Q. What was the issue about this notice posted on
9 the front door?

10 A. That basically they couldn't come back into the
11 facility unless they were coming to see the
12 superintendent. They were letting all of the
13 staff know that they had left and they were not
14 allowed back in.

15 Q. What day of the week do you show the 13th is on
16 your calendar?

17 MR. BOATRIGHT: It's Monday.

18 Q. (By Mr. Meyers) Is it Monday?

19 A. Monday, uh-huh.

20 Q. So had Susan actually resigned on the 10th?

21 A. I don't know about --

22 Q. Because it looks like the memo is saying don't
23 let Susan in on the 10th. And the resignation
24 letter is dated on 10th and indicates it was
25 received on the 10th.

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- 1 A. I honestly don't know the chronological events.
2 I know that I became aware of it either late
3 Monday or Tuesday. And I'm sure of that fact
4 because I called the coordinator in the Kansas
5 City office and told them to take the shifts
6 out of the computer. And I do have a note that
7 I called Susan Nurnberg on Friday. And I don't
8 recall having a conversation with her at that
9 point. I know that I did talk to her after she
10 left and requested that she bring her ID badge
11 back in.
- 12 Q. Did she do that?
- 13 A. I believe she did, yes.
- 14 Q. Did she leave it with you or somebody from the
15 facility?
- 16 A. At the facility.
- 17 Q. Did you have any discussion with Susan after
18 you found out about the resignation beyond just
19 asking her to bring her ID badges back?
- 20 A. Yes, we discussed this situation, which she
21 filled me in on that's in the handwritten that
22 she was forced into a car.
- 23 Q. Page 90, the last page of Exhibit 41?
- 24 A. Yes.
- 25 Q. And there she's telling you about an incident

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1 that occurred shortly before her resignation?
2 A. Yes.
3 Q. Did she tell you that this was in part why she
4 resigned?
5 A. Yes, she felt that she was in an unsafe
6 situation.
7 Q. Do you remember anything about what she told
8 you about this incident about being forced in
9 the car beyond what is recorded here on page
10 90, the last page of Exhibit 41?
11 A. No, this pretty much sums up the conversation.
12 Q. Is there anything other than the return of the
13 ID badges and the incident involving her being
14 forced in the car that you recall discussing
15 with her after learning of her resignation?
16 A. I asked her if we could be of service to her
17 elsewhere, if she would want to work somewhere
18 else that we had work available. And she said
19 she was looking for a position and that Kansas
20 City and St. Louis were too far to drive.
21 Q. I notice in the tape, I think it was on the
22 20th, that you had some discussions about would
23 they go to Columbia and they both indicated yes
24 and you asked about the Lake of the Ozarks and
25 one of them said that that was kind of a

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1 problem in the summer to get in and out of.

2 A. Too far, uh-huh.

3 Q. Did you ever come up with anything in mid
4 Missouri to offer to either Becky or Susan?

5 A. No. Basically the marketing calls that I did in
6 Jeff City there were no agencies in the area
7 that were using any outside personnel. The two
8 hospitals I marketed -- actually one hospital,
9 Regional, and a doctor's facility, Central
10 Medical, I thought might be possibilities, but
11 they were appalled at our rates and not
12 interested. And we actually marketed Columbia
13 on several occasions, myself and I believe our
14 branch director in St. Louis, and as is the
15 case over the last eight years, Columbia just
16 doesn't use outside agencies. They use
17 occasional travelers, which means a travel
18 company at a much reduced pay rate. So that I
19 didn't have any work for them in that area.

20 (Deposition Exhibit No. 42 was marked
21 for identification.)

22 Q. (By Mr. Meyers) I'll show you Exhibit 42, which
23 appears to be a memo from Julie to Alma
24 McKinney dated July 8, 1998. Have you ever seen
25 that before?

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1 A. No.

2 Q. It refers to the fact that Susan was ill on
3 July 8th, correct?

4 A. Yes.

5 Q. And it says that Julie apparently found out or
6 made a call that day to inquire about something
7 and learned that -- the correctional officer
8 told her that the front door officer told him
9 that Susan or a nurse had told the front door
10 officer to read the TB skin test. Is that the
11 way you read it?

12 A. Uh-huh.

13 Q. Yes?

14 A. Yes.

15 Q. Did Julie ever make you aware of that issue?

16 A. No.

17 Q. Or Alma?

18 A. Not that I recall.

19 Q. So you don't really know anything about what's
20 mentioned here in Exhibit 42 beyond what's in
21 the document it's, correct?

22 A. Correct.

23 (Deposition Exhibit No. 43 was marked
24 for identification.)

25 Q. (By Mr. Meyers) I show you Exhibit 43 to your

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1 deposition. Is that a May 27, 1998 letter that
2 Mr. Lite wrote to Becky Hunt?

3 A. Yes, it is.

4 Q. And basically this is the letter that you
5 discussed with Mr. Hunt, as I recall, at the
6 end of the tape on the May 20 conversation that
7 we should follow up with a letter, basically.

8 A. I discussed it with David Lite, yes.

9 (Deposition Exhibit No. 44 was marked
10 for identification.)

11 Q. (By Mr. Meyers) And then is Exhibit 44
12 basically the identical letter with the
13 exception that it's addressed to Susan
14 Nurnberg?

15 A. It looks like it is identical, yes.

16 Q. Now, is what you recite about what you were
17 told by the Department of Corrections in the
18 third paragraph -- or what Mr. Lite recites an
19 accurate recitation of what you were told and
20 the assurances you were given when you met with
21 Ms. McKinney and Ms. Ives on May 19?

22 A. It's pretty much it. I don't recall them saying
23 exactly when the investigation would be
24 complete. I honestly don't recall them saying a
25 time period. They told us they would let us

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1 know when it was complete.

2 Q. Mr. Lite says that he recalled them assuring
3 the two of you that the grievances were being
4 taken seriously.

5 A. Yes.

6 Q. Do you recall that?

7 A. Yes.

8 Q. And assuring the two of you that no retaliation
9 would be taken?

10 A. Yes.

11 (Deposition Exhibit No. 45 was marked
12 for identification.)

13 Q. (By Mr. Meyers) Ms. MacLeod, I'm handing you
14 Exhibit 45 to your deposition, I apologize I
15 don't have any extra copies of it. But is that
16 the letter that you wrote to Susan Nurnberg on
17 July 17?

18 A. It's a later David Lite, the human resource
19 manager wrote.

20 Q. Basically saying what you and I discussed
21 earlier expressing sadness that the situation
22 could not be resolved and asking her to return
23 her identification badge?

24 A. Yes. And he referred her to one of our local
25 offices or our travel division and sent her a

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1 list of the offices and telephone numbers.

2 (Deposition Exhibit No. 46 was marked
3 for identification.)

4 Q. (By Mr. Meyers) And then is Exhibit 46 a
5 similar letter to Becky Hunt asking her to
6 return her identification badge?

7 A. And her keys, yes.

8 Q. Before I mark these why don't you kind of walk
9 me through this so I know what I have got here.
10 These are the computer files for Becky and
11 Susan?

12 A. Yes. This is actually Susan's computer file
13 for when I sent her file over to the St. Louis
14 branch.

15 MR. BOATRIGHT: You said Susan.

16 A. Becky, excuse me. Becky Hunt, yes. And it was
17 entered into the St. Louis computer here. And
18 it showed the negative availability that I told
19 you that she wouldn't be available until 6/15.

20 Q. So you interpreted that to mean that she may
21 have given notice to the Department of
22 Corrections that she was no longer going to be
23 there after 6/15?

24 A. Right. And then these are notes, the last page,
25 that are put into the computer that our

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2 FOR THE WESTERN DISTRICT OF MISSOURI

3 REBECCA HUNT and)
4 SUSAN NURNBERG,)

5 Plaintiffs,)

6 vs.)

7 STATE OF MISSOURI)
8 DEPARTMENT OF CORRECTIONS,)
9 and FAVORITE NURSES, INC.,)

10 Defendants.)

Case No. 99-4158-CV-C-5

March 2, 2000

Jefferson City, Mo.

11 VIDEOTAPED DEPOSITION OF SUSAN NURNBERG,

12 a Plaintiff, produced, sworn and examined on the 2nd day of
13 March, 2000, between the hours of 8:00 a.m. and 6:00 p.m. of
14 that day at the law offices of the Attorney General, in the
15 City of Jefferson, State of Missouri, before

16 TRACY L. THORPE
17 Certified Shorthand Reporter
18 ASSOCIATED COURT REPORTERS, INC.
19 714 West High Street
20 Jefferson City, Missouri 65101
(573) 636-7551
(573) 442-3600

21 and Notary Public within and for the State of Missouri,
22 commissioned in Boone County, in the above-entitled cause,
23 on the part of the Defendants, pursuant to notice and
24 agreement.
25

EXHIBIT K

1
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1 It's only been in business probably since the last of
2 January, I would say.

3 Q. When did you start with them? The last of
4 January or --

5 A. No. I started about two weeks ago actually.
6 I've been in training, so I've only been there actually
7 on-site about three days.

8 Q. And what are you doing for them?

9 A. I am the RN that does physical assessments and
10 drug screens, I take care of sick, illness problems, you
11 know, if they have athlete's foot or they get the flu,
12 assess most of their physical medical needs.

13 Q. When you worked at Jefferson City Manor, who
14 would have been your supervisor or most familiar with your
15 work?

16 A. Mary Chidwigen (phonetic spelling) was the
17 director of nursing.

18 Q. Did her husband work for, like, Highway and
19 Transportation and they moved with their daughter, Joan?

20 A. Yes. I think that's -- I think that's right.

21 Q. They're no longer in this area, are they?

22 A. I last heard that they had moved to -- I want
23 to say Cape Girardeau, but I can't be positive, but that's
24 been years ago that I heard that.

25 Q. And Whispering Oaks, who would have been your

11

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1 supervisor or familiar with your --

2 A. Margie Rost was the director of nursing there
3 at that time.

4 Q. Is she still in this area, do you know?

5 A. I have no idea.

6 Q. And Whispering Oaks is located where?

7 A. Whispering Oaks and -- would be on Edgewood.

8 Q. Okay.

9 A. Over behind Memorial Hospital. That empty
10 facility that's always standing back there.

11 Q. Right. And the reason you left there is
12 because it closed?

13 A. Uh-huh.

14 Q. And when you left Jefferson City Manor, why
15 was that?

16 A. I think I had -- had a baby.

17 Q. Okay. And Riverside Hospital you left because
18 it closed also?

19 A. Uh-huh.

20 Q. You have to answer verbally.

21 A. Yes.

22 Q. Who would have been your supervisor or person
23 most familiar with your work there?

24 A. Excuse me. At what place?

25 Q. At Riverside.

12

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1 A. I can't think of the man's name, the
2 administrator there, it's been so long ago. I'm sorry.
3 Q. When you were a substitute teacher, what --
4 did you just teach whatever they needed?
5 A. Yes. Whatever classes they needed.
6 Q. Lincoln Manor, who was the physician medical
7 director for whom you did this favor?
8 A. That would most likely, if I can recall, would
9 be Robert Tanner, Dr. Tanner. He's retired now, I think.
10 Q. And you said that you were the on-site RN.
11 Does that make you the charge nurse or director of nursing?
12 A. The charge nurse.
13 Q. Anybody besides Dr. Tanner who would have been
14 familiar with your work at Lincoln Manor?
15 A. There is one nurse there that's been there for
16 almost 20 years, Edith Vogel. I believe she's still there.
17 Q. Lewis and Clark Middle School, do you know
18 Betty Morris? Wasn't she a nurse there? She's, like, the
19 school nurse?
20 A. Yes. I think that -- I think that is her last
21 name, Morris.
22 Q. And I'm assuming since you're assigned to work
23 with essentially two special needs children, you're
24 reporting to the principal or assistant principal?
25 A. Principal would have been my supervisor.

13

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1 Q. And who's the principal there?
2 A. Bob Steffes (phonetic spelling), Dr. Steffes.
3 I need to clarify that.
4 Q. Sure.
5 A. I was assigned one child. I took the other
6 child on as a favor.
7 Q. Okay. Well, you'd mentioned two different --
8 A. Yeah.
9 Q. -- so -- that -- was a year and a half
10 period --
11 A. Yeah.
12 Q. -- so I thought maybe you did one one year and
13 one the next.
14 A. Same time.
15 Q. And at Preferred Family Health Care you said
16 you just started a couple of weeks ago. Do you have a title
17 there?
18 A. I think I'm just called the RN staff.
19 Q. Okay. And who's your supervisor there?
20 A. Mark Stringer is the administrator.
21 Q. What are you earning at Preferred Family
22 Health Care?
23 A. I think that he quoted me 30,000 a year.
24 Q. And are you a full-time employee who's
25 entitled to their benefit package and stuff?

14

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1 A. The benefit package starts, I think, in May as
2 far as insurance is concerned.
3 Q. And what other benefits are you entitled to?
4 A. I think he did mention vacation time, but
5 that's about it. That's about all we discussed.
6 Q. Retirement plan, anything like that?
7 A. I don't know about that.
8 Q. When you were working at Lewis and Clark, what
9 were your earnings?
10 A. You want what I brought home in my paycheck
11 or -- I think it was 9,000 -- it was 11,500 a year, in that
12 area.
13 Q. And did you -- were you entitled to benefits?
14 A. Yes.
15 Q. Do you know what your benefits were working in
16 the public school system?
17 A. I had Health Link Insurance and some type of
18 life insurance.
19 Q. Did you participate in a retirement plan in
20 any way?
21 A. I don't know if I did or not. I'm sorry.
22 Q. That's all right. Is -- your working at Lewis
23 and Clark, would that have been the employment that
24 immediately followed your leaving employment with Favorite
25 Nurses?

15

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1 A. Yes.

2 Q. You left your employment with Favorite Nurses,
3 assigned to JCCC, on what date, do you remember?

4 A. July the 10th, I believe.

5 Q. And how long a period of time would you have
6 been out of work following your July 10 resignation?

7 A. I think -- I believe school started
8 August 23rd.

9 Q. Between July 10 and August 23rd, did you make
10 any attempts to obtain employment?

11 A. Yes.

12 Q. What attempts did you make?

13 A. I put out resumes and made lots of phone
14 calls.

15 Q. Before finding the position at Lewis and
16 Clark, did you have offered to you any positions between
17 July 10 and August 23rd?

18 A. No.

19 Q. Before accepting or after accepting the Lewis
20 and Clark position, did you have any other positions offered
21 to you?

22 A. No.

23 Q. Have you ever been involved in any legal
24 proceeding besides this lawsuit?

25 A. Not that I can ever recall.

16

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1 they were. And I found that very uncomfortable and unusual.
2 Q. Why did you find it uncomfortable and unusual?
3 A. Well, everyone has their -- their preference
4 for space, but they would be right up as close as they could
5 get.
6 Q. How close is as close as they could get? Were
7 they touching you?
8 A. Not touching, but if we would -- if I would
9 have moved, we would have been.
10 Q. And, again, why did you -- why did that make
11 you uncomfortable? It violated your personal space?
12 A. It did more than violate my personal space.
13 It was -- if it had just been them standing there, but it
14 was the leers that I got.
15 Q. Describe for me the leers, what you mean by
16 "leers."
17 A. Well, if they would talk to me, instead of
18 looking at me in the face, they would look at my chest.
19 Q. Anything else besides looking at your chest
20 that you mean when you use the term "leers"?
21 A. They would look at Becky, look at her behind.
22 It was just a very uncomfortable day.
23 Q. At any point in that first day did you tell
24 either Mr. Perry or Mr. Seaman that they were making you
25 uncomfortable?

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1 A. No.
2 Q. Why not?
3 A. It was the very first day and I didn't want to
4 start off on a bad foot right off the bat.
5 Q. At any time on that first day if Mr. Perry and
6 Mr. Seaman were making you uncomfortable, why didn't you go
7 talk to Mr. Dormire about it?
8 A. Probably because I was pretty stressed about
9 it at that point and I didn't even think about doing that.
10 Q. You know, most people if somebody's bugging
11 them, you tell them, Hey, bug off or stop it, or whatever.
12 I mean, that's the sensible thing that most people do. Why
13 didn't you do that?
14 MR. MEYERS: Object to the form of the
15 question, it's argumentative and it's asked and answered.
16 Go ahead.
17 BY MS. TROWER:
18 Q. You can answer.
19 A. Why didn't I tell them? Probably because I
20 was too polite to say that to them because I wanted to
21 really assess what was going on.
22 Q. What did you think was going on that first
23 day?
24 A. I wasn't quite sure at that time. I was just
25 very uncomfortable and couldn't -- and stressed out.

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1 Q. What happened next in terms of your
2 orientation of the institution?
3 A. The next day?
4 Q. If that's the next thing so --
5 A. When we showed up the next morning, they were
6 waiting at the front step for us.
7 Q. Anything said at that time?
8 A. They looked at their watch, I think Mitch did
9 or Rodney, I don't know which, and -- like we had been late
10 or they'd been waiting a long time.
11 Q. Anything else said or done upon that
12 encounter?
13 A. They were still, I believe, going to take us
14 through other places, introduce us to other people. They
15 were going to go up to the office and show us the computer
16 and ask about our schedules that day.
17 Q. Is that what then happened?
18 A. I can't say it happened exactly in that time
19 frame, in that morning, but during the day.
20 Q. When you first meet them on the steps the next
21 morning and they explained to you that they want to continue
22 to show you around and take you to the office and introduce
23 you to the computer and that sort of thing, did you say, No,
24 we don't need that?
25 A. No.